

ATTACHMENT C

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND/ODESSA DIVISION

MICHAEL COATES, BRANDON
RAYBION, DANIEL VENABLE,

Plaintiffs,

vs.

TNT CRANE & RIGGING, INC.,

Defendant.

§
§
§
§
§
§
§
§
§
§

MO:22-CV-00018-DC

DEFENDANT'S EXHIBIT LIST

The following is a list of exhibits that Defendant TNT Crane and Rigging, Inc. expects to present into evidence at trial.

NO.	DESCRIPTION	OFFER	OBJECT	DATE ADMIT	DATE N/ADMIT
D-1	Michael Coates Timesheets				
D-2	Michael Coates Payroll Records				
D-3	Michael Coates Credit Card Transactions Record				
D-4	Brandon Raybion Timesheets,				
D-5	Brandon Raybion Payroll Records				
D-6	Brandon Raybion Credit Card Transaction Records				

NO.	DESCRIPTION	OFFER	OBJECT	DATE ADMIT	DATE N/ADMIT
D-7	Daniel Venable Timesheets				
D-8	Daniel Venable Payroll Records				
D-9	Daniel Venable Credit Card Transaction Records				
D-10	TNT Employee Handbook				
D-11	Payroll, Per Diem, Pretrip Memo, March 13, 2015				
D-12	Payroll, Per Diem, Pretrip Memo, April 1, 2018				
D-13	Yard Time Memo, dated June 18th, 2015				
D-14	TNT Driver's Handbook				
D-15	TNT Crane Operator Job Description, Revised Oct. 21, 2014				

The following is a list of exhibits that Defendant TNT Crane and Rigging, Inc. may present into evidence at trial.

NO.	DESCRIPTION	OFFER	OBJECT	DATE ADMIT	DATE N/ADMIT
D-16	Coates' Objections and Responses to TNT's First Set of Request for Admission				

NO.	DESCRIPTION	OFFER	OBJECT	DATE ADMIT	DATE N/ADMIT
D-17	Coates' Supplemental Objections and Responses to TNT's First Set of Request for Admission				
D-18	Coates' Responses to TNT's Second Set of Request for Admission				
D-19	Raybion's Objections and Responses to TNT's First Set of Request for Admission				
D-20	Raybion's Responses to TNT's Second Set of Request for Admission				
D-21	Venable's Objections and Responses to TNT's First Set of Request for Admission				
D-22	Venable's Responses to TNT's Second Set of Request for Admission				
D-23	Coates' Objections and Responses to TNT's First Set of Interrogatories				
D-24	Coates' Supplemental Objections and Responses to TNT's First Set of Interrogatories				
D-25	Coates' Objections and Responses to TNT's Second Set of Interrogatories				
D-26	Coates' Objections and Responses to TNT's Third Set of Interrogatories				
D-27	Coates' Objections and Responses to TNT's Fourth Set of Interrogatories				

NO.	DESCRIPTION	OFFER	OBJECT	DATE ADMIT	DATE N/ADMIT
D-28	Raybion's Objections and Responses to TNT's First Set of Interrogatories				
D-29	Raybion's Supplemental Objections and Responses to TNT's First Set of Interrogatories				
D-30	Raybion's Objections and Responses to TNT's Second Set of Interrogatories				
D-31	Raybion's Objections and Responses to TNT's Third Set of Interrogatories				
D-32	Raybion's Objections and Responses to TNT's Fourth Set of Interrogatories				
D-33	Venable's Objections and Responses to TNT's First Set of Interrogatories				
D-34	Venable's Supplemental Objections and Responses to TNT's First Set of Interrogatories				
D-35	Venable's Objections and Responses to TNT's Second Set of Interrogatories				
D-36	Venable's Objections and Responses to TNT's Third Set of Interrogatories				
D-37	Venable's Objections and Responses to TNT's Fourth Set of Interrogatories				

Dated: December 28, 2022

Respectfully submitted,

/s/ G. Mark Jodon

G. Mark Jodon

Texas State Bar No. 10669400

mjodon@littler.com

Joseph R. Buller, III

Texas State Bar No. 24110784

jbuller@littler.com

LITTLER MENDELSON, P.C.

A Professional Corporation

1301 McKinney Street

Suite 1900

Houston, TX 77010

713.951.9400

713.951.9212 (Fax)

ATTORNEYS FOR DEFENDANT

TNT CRANE & RIGGING, INC.

CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2022, I served a copy of the foregoing on all counsel of record by the Court's ECF system, including:

Edmond S. Moreland, Jr.
Daniel A. Verrett
Moreland & Verrett, P.C.
700 West Summit Drive
Wimberly, TX 78676
edmond@morelandlaw.com
daniel@morelandlaw.com

Aaron Johnson
Fair Labor Law
314 E. Highland Mall Blvd., Suite 401
Austin, Texas 78752
ajohnson@fairlaborlaw.com

/s/ G. Mark Jodon

G. Mark Jodon

4883-3574-4582.2 / 110080-1005